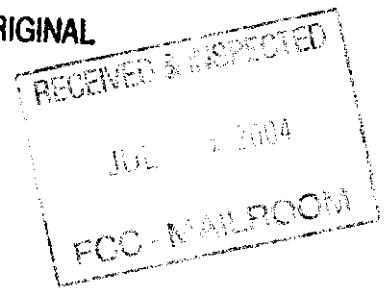




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SRT Connections
1400 20th Ave. SW
Suite 3
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June 21, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20544

Re: In the Matter of The Pay Telephone Reclassification and
Compensation Provisions of the Telecommunications Act of 1996,
CC Docket 96-128

Dear Ms. Dortch:

SRT Communications Inc Telephone Company ("SRT") submits this letter and accompanying certification as record that SRT is not a "Completing Carrier" as that term is defined in the Commission's Order in CC Docket 96-128 ("Order")¹, released on October 3, 2003, respecting the obligations of Completing Carriers to provide certain compensation and reporting to payphone service providers (PSPs), replacing the Commission's interim compensation rules effective July 1, 2004.

As SRT is not a Completing Carrier nor does it handle the types of calls the Commission has specified as being subject to both compensation and reporting to PSPs, SRT is not subject to such requirements at this time. If SRT operations are altered to the extent that SRT necessarily becomes a Completing Carrier, SRT intends to fully comply with the Commission's rules pertaining to this and all other payphone compensation and reporting matters.

Sincerely,

Julie Lizotte
Director of Regulatory Affairs
SRT Communications Inc

cc: Ms. Ruth Jaeger
President
APCC Services, Inc.
625 Slater Lane, Suite 104
Alexandria, Virginia 22314

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¹ The Pay Telephone Reclassification and Compensation Provisions of the
Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).



**PAY TELEPHONE COMPLETING CARRIER CERTIFICATION
OF SRT COMMUNICATIONS INC**

RECEIVED & RESPECTED
JUL 1 2004
FCC - MAILROOM

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1. My name is *Julie Lizotte*. I currently serve as the *Director of Regulatory Affairs* of *SRT Communications Inc (SRT)*, a provider of local exchange telecommunications services as an Independent Local Exchange Carrier in the state of *North Dakota*. In this capacity, I have become familiar with the network operations of *SRT* and its practices associated with the completion of calls originated from Pay Telephones.
2. SRT is not a Completing Carrier as defined by Commission in 47 CFR § 64.1300.
3. SRT's provision of operator services for the completion of local calls from pay telephones is handled by QWest through a contractual arrangement yet operator services from payphones goes through the payphones subscribers' interstate operator.
4. SRT has confirmed with QWest that any calls processed by QWest are included in the respective call tracking systems and compensation remittance process of QWest.
5. SRT does not currently provide a coinless access code service.
6. SRT does not currently provide a subscriber toll-free service.
7. In consideration of the aforementioned facts, SRT is not subject to the compensation or reporting requirements related to the Commission's Report and Order¹ and associated revisions to 47 CFR Sections 64.1300, 64.1310, and 64.1320.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on *DATE*.


Julie Lizotte
Director of Regulatory Affairs
SRT Communications Inc
PO Box 2027
Minot ND 58702-2027

¹ *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunication Act of 1996, CC Docket No. 96-128, Report and Order, (2003) (Order).*